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11 *C-BASS Mortgage Loan Asset Backed Certificates, Series 2006-CB4*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 U.S. BANK NATIONAL ASSOCIATION, AS
15 TRUSTEE, FOR THE C-BASS MORTGAGE
16 LOAN ASSET BACKED CERTIFICATES,
17 SERIES 2006-CB4,

18 Plaintiff,

19 vs.

20 PANDA LLC SERIES 6233 HALSTEAD;
21 SHADOW SPRINGS COMMUNITY
22 ASSOCIATION; RED ROCK FINANCIAL
23 SERVICES,

24 Defendants.

25 PANDA LLC SERIES 6233 HALSTEAD,

26 Counterclaimant,

27 vs.

28 U.S. BANK NATIONAL ASSOCIATION, AS
TRUSTEE, FOR THE C-BASS MORTGAGE
LOAN ASSET BACKED CERTIFICATES,
SERIES 2006-CB4,

Counter-Defendant.

SHADOW SPRINGS COMMUNITY
ASSOCIATION,

Cross-Claimant,

Case No.: 2:17-cv-00493-RFB-PAL

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE**

(SECOND REQUEST)

1 vs.
2 RED ROCK FINANCIAL SERVICES,
3
4 Cross-Defendant.
5 RED ROCK FINANCIAL SERVICES,
6 Counter-Claimant,
7 vs.
8 SHADOW SPRINGS COMMUNITY
9 ASSOCIATION,
10 Counter-Defendant.

11 COMES NOW Plaintiff/Counter-Defendant, U.S. Bank National Association, as
12 Trustee, for the C-BASS Mortgage Loan Asset Backed Certificates, Series 2006-CB4 (“U.S.
13 Bank”), Defendant/Counterclaimant, Panda LLC Series 6233 Halstead, Defendant/Counter-
14 Claimant Red Rock Financial Services, and Defendant/Counter-Defendant, Shadow Springs
15 Community Association (“Shadow Springs”), by and through undersigned and respective
16 counsel of record, and hereby stipulate as follows:

17 As previously indicated to the Court, U.S. Bank originally attempted to depose the
18 30(b)(6) witness for Shadow Springs prior to the close of discovery, however, the parties have
19 encountered difficulties completing the deposition. The deposition of the designated witness for
20 Shadow Springs is currently scheduled for March 6, 2018, while dispositive motions are
21 currently due by February 28, 2018. The parties are requesting an extension of the dispositive
22 motion deadline so that the parties have additional time to fully brief the Court in this matter.

23 LR 26-4 requires a stipulation to extend a deadline to be made no later than 21 days
24 before the subject deadline and if made within 21 days of the deadline, it must be supported by a
25 showing of good cause. This stipulation is within 21 days of the discovery deadline (February
26 28, 2018). Good cause exists to extend the discovery deadline, namely scheduling difficulties
27 that prevented the Rule 30(b)(6) deposition from taking place on the previously scheduled dates
28 of December 20, 2017, January 4, 2018, and January 23, 2018.

1 IT IS HEREBY STIPULATED AND AGREED that the Parties shall have an extension
2 of thirty (30) days, up to and until March 30, 2018, to file their respective Motions for Summary
3 Judgment.

4 This is the parties' second request for extension of the dispositive motions deadline.
5 This request is not intended to cause any delay or prejudice to any party.

6 DATED this 28th day of February, 2018.

DATED this 28th day of February, 2018.

7 WRIGHT, FINLAY & ZAK, LLP

KOCH & SCOW LLC

8 /s/ Krista J. Nielson

/s/ Steven B. Scow

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Financial Services*

15 DATED this 28th day of February, 2018.

DATED this 28th day of February, 2018.

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17 /s/ Elizabeth B. Lowell

/s/ Luis A. Ayon

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ORDER

24 IT IS SO ORDERED.

25 Dated this 2nd day of March, 2018.

26 
27 UNITED STATES MAGISTRATE JUDGE
28